



Privacy Policy

Important note concerning data processing in connection with Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the responsible body for the data processing that occurs via this website has their basis outside of the European Economic area and Switzerland, then the associated Google Analytics data processing is carried out by Google LLC. Google Ireland Limited and Google LLC. will hereinafter be referred to as "Google".

Google Analytics uses "cookies", which are text files saved on the site visitor's computer, to help the website analyse their use of the site. The information generated by the cookie (including the truncated IP address) about the use of the website will normally be transmitted to and stored by Google.

Google Analytics is used exclusively with the extension "_anonymizeIp ()" on this website. This extension ensures an anonymization of the IP address by truncation and excludes a direct personal reference. Via this extension Google truncates the site visitor's IP address within member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional situations will the site visitor's full IP address be transmitted to Google servers in the United States and truncated there. The IP address, that is provided by the site visitor's browser in using Google Analytics will not be merged by Google with other data from Google.

On behalf of the site operator, Google will use the information collected to evaluate the use of the website, to compile reports on website activity and to provide other website and internet related services to the site operator (Art. 6 (1)(f) GDPR). The legitimate interest in data processing lies in the optimization of this website, the analysis of the use of the website and the adaptation of the content. The interests of the users are adequately protected by the pseudonymization of their data.

Google LLC. has certified their compliance with the EU-U.S. [Privacy Shield](#) Framework and on that basis they provides a guarantee to comply with European data protection law. The data sent and linked to the Google Analytics cookies, e.g. user IDs or advertising IDs will be automatically deleted after 50 months. The deletion of data whose retention period has been reached is done automatically once a month.

The website visitor may refuse the use of cookies by selecting the appropriate settings in their browser. The website visitor can also prevent Google from collecting information (including their IP address) via cookies and processing this information by downloading this browser plugin and installing it: <http://tools.google.com/dlpage/gaoptout>

The website visitor can prevent data collection via Google Analytics on this website by clicking here. An "Opt-out Cookie" shall then be applied which shall prevent any future



collection of the site visitors data when visiting this website.

Further information concerning data processing and use by Google, the settings and deactivation possibilities can be found in the Google Privacy Policy (<https://policies.google.com/privacy>) as well as in the Google Ads Settings (<https://adssettings.google.com/authenticated>).

reCAPTCHA

We use the reCAPTCHA service provided by Google LLC (Google) to protect your submissions via internet submission forms on this site. This plugin checks if you are a person in order to prevent certain website functions from being (ab)used by spam bots (particularly comments). This plugin query includes the sending of the IP address and possibly other data required by Google for the Google reCAPTCHA service. For this purpose your input will be communicated to and used by Google. However, your IP address is previously truncated by Google within member states of the European Union or in other states which are party to the agreement on the European Economic Area and is, as such, anonymized. Only in exceptional cases is a full IP address transmitted to a Google server in the United States and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of this service. The IP address provided by reCaptcha from your browser shall not be merged with any other data from Google.

This data collection is subject to the data protection regulations of Google (Google Inc.). For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy?hl=en>

By using the reCAPTCHA service, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

WESTMINSTER WOMEN'S CLINIC (WWC) is committed to protecting and respecting your privacy.

WWC understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end we comply fully with the data protection law in force in the UK ("Data Protection Laws") and with all applicable clinical confidentiality guidelines including those published from time to time by the General Medical Council and the Nursing and Midwifery Council.



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This Privacy Policy sets out the basis on which we collect and process personal data about you including our practices regarding the collection, use, storage and disclosure of personal data that we collect from you and/or hold about you, and your rights in relation to that data.

Please read the following carefully to understand how we process your personal data. By providing your personal data to us or by using our services, website or other online or digital platform(s) you are accepting or consenting to the practices as described or referred to in this Privacy Policy.

For the purpose of Data Protection Laws, the data controller is WWC, with registered address at 3A/50 Westminster Bridge Road, London SE1 7QY and a Company Registered in England Number: **10819082**

When we refer to 'we', 'us' and 'our', we mean WWC.

When we refer to personal data in this policy, we mean information that can or has the potential to identify you as an individual.

Accordingly, we may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit one of our websites, complete a form, access our services or speak to us. Depending on what services you receive from us this may include sensitive personal data such as information relating to your health.

Personal data we collect from you may include the following:

- Information that you give us when you enquire or become a customer or patient of us or apply for a job with us including name, address, contact details (including email address and phone number).
- The name and contact details (including phone number) of your next of kin.
- Details of referrals, quotes and other contact and correspondence we may have had with you.
- Details of services and/or treatment you have received from us or which have been received from a third party and referred on to us.
- Information obtained from customer surveys, promotions and competitions that you have entered or taken part in.
- Recordings of calls we receive or make.
- Notes and reports about your health and any treatment and care you have received and/or need, including about clinic and hospital visits and medicines administered.
- Patient feedback and treatment outcome information, you provide.
- Information about complaints and incidents.



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- Information you give us when you make a payment to us, such as financial or credit card information.
- Other information received from other sources, including from your use of websites and other digital platforms we operate or the other services we provide, information from business partners, advertising networks, analytics providers, or information provided by other companies who have obtained your permission to share information about you.
- Where you have named someone as your next of kin and provided us with personal data about that individual, it is your responsibility to ensure that that individual is aware of and accepts the terms of this Privacy Policy.

Where you use any of our websites, we may automatically collect personal data about you including:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- The data that we request from you may include sensitive personal data. This includes information that relates to the mental or physical health or racial or ethnic origin (which may include children's data). By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

We may collect personal data about you if you:

- Visit one of our websites
- Enquire about any of our services or treatments
- Register to be a customer or patient with us or book to receive any of our services or treatments
- Fill in a form or survey for us
- Carry out a transaction on our website
- Participate in a competition or promotion or other marketing activity
- Make online payments
- Contact us, for example by email, telephone or social media
- Participate in interactive features on any of our websites.



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In the interests of training and continually improving our services, calls to WWC and its agents may be monitored or recorded.

Your personal data will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws, clinical records retention periods and clinical confidentiality guidelines.

Sensitive personal data related to your health will only be disclosed to those involved with your treatment or care, or in accordance with UK laws and guidelines of professional bodies or for the purpose of clinical audits (unless you object). Further details on how we use health related personal data are given below. We will only use your sensitive personal data for the purposes for which you have given us your explicit consent to use it. Please note that, although we have set out the purposes for which we may use your personal data below, we will not use your sensitive personal data for those purposes unless you have given us your explicit consent to do so.

We may use your personal data to:

- Enable us to carry out our obligations to you arising from any contract entered into between you and us including relating to the provision by us of services or treatments to you and related matter such as, billing, accounting and audit, credit or other payment card verification and anti-fraud screening.
- Provide you with information, products or services that you request from us.
- To notify you about changes to our products or services.
- Respond to requests where we have a legal or regulatory obligation to do so.
- Check the accuracy of information about you and the quality of your treatment or care, including auditing medical and billing information for insurance claims as well as part of any claims or litigation process.
- Support your doctor, nurse or other healthcare professional.
- Assess the quality and/or type of care you have received (including giving you the opportunity to complete customer satisfaction surveys) and any concerns or complaints you may raise, so that these can be properly investigated.
- To conduct and analyse market research.
- To ensure that content from any of our websites is presented in the most effective manner for you and for your computer.

We protect all personal data we hold about you by ensuring that we have appropriate organisational and technical security measures in place to prevent unauthorised access or



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unlawful processing of personal data and to prevent personal data being lost, destroyed or damaged. We conduct assessments to ensure the ongoing security of our information systems.

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Any personal data you provide will be held for as long as is necessary having regard to the purpose for which it was collected and in accordance with all applicable UK laws. Personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we transfer your personal data outside the EEA, we will ensure that there are adequate protections in place for your rights, in accordance with Data Protection Laws. By submitting your personal data, and in providing any personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored securely. Any payment transactions on our website will be processed securely by third party payment processors. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet cannot be guaranteed as completely secure. However, we ensure that any information transferred to our websites is via an encrypted connection. Once we have received your information, we will use strict procedures and security features for prevention of unauthorised access.

At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission; if you choose to send or receive such information via email, you do so at your own risk.

In the usual course of our business we may disclose your personal data (to the extent necessary) to certain third-party organisations that we use to support the delivery of our services. This may include the following:

- A doctor, nurse, carer or any other healthcare professional involved in your treatment.
- Other members of support staff involved in the delivery of your care, like receptionists and porters.



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- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer.
- NHS organisations, including NHS Resolution, NHS England, Department of Health.
- Other private sector healthcare providers.
- Your GP.
- Your dentist.
- Your clinician (including their medical secretaries).
- Third parties who assist in the administration of your healthcare, such as insurance companies.
- Private Healthcare Information Network.
- National and other professional research/audit programmes and registries, as detailed under Purpose 4 above.
- Government bodies, including the Ministry of Defence, the Home Office and HMRC.
- Our regulators, like the Care Quality Commission, Health Inspectorate Wales and Healthcare Improvement Scotland.
- The police and other third parties where reasonably necessary for the prevention or detection of crime.
- Our insurers.
- Debt collection agencies.
- Credit referencing agencies.
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.

We may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

Where a third-party data processor is used, we ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under Data Protection Laws.

We may also disclose your personal data to third parties in the event that we sell or buy any business or assets or where we are required by law to do so.

Sensitive personal data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Policy. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies. Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment expenses or their agents. It may also be provided to external service providers and regulatory bodies (unless you object) for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

Hospitals / Clinics working with us: We share clinical information about you with hospitals / clinics as we think necessary for your treatment. We remain the data controller of your personal data, either alone or jointly with us and will be required to maintain their own records in accordance with Data Protection Laws and applicable clinical confidential



guidelines and retention periods. Where that is the case, we may refer you to that hospital / clinic to exercise your rights over your data. Our contracts with hospital / clinics require them to cooperate with those requests. In all circumstances, those hospitals / clinics will only process your personal data for the purposes set out in this Privacy Policy or as otherwise notified to you.

External practitioners: If we refer you externally for treatment, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Your GP: If when treating you we believe it to be clinically advisable, we may also share information about your treatment with your GP. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.

Your insurer: We share with your medical insurer information about your treatment, its clinical necessity and its cost, only if they are paying for all or part of your treatment with us. We provide only the information to which they are entitled. If you raise a complaint or a claim we may be required to share personal data with your medical insurer for the purposes of investigating any complaint/claim.

The NHS: If you are referred to us for treatment by the NHS, we will share the details of your treatment with the part of the NHS that referred you to us, as necessary to perform, process and report back on that treatment.

Medical regulators: We may be requested – and in some cases can be required – to share certain information (including personal data and sensitive personal data) about you and your care with medical regulators such as the General Medical Council or the Nursing and Midwifery Council, for example if you make a complaint, or the conduct of a medical professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.

From time to time we may also make information available on the basis of necessity for the provision of healthcare, but subject always to patient confidentiality.

In an emergency and if you are incapacitated, we may also process your personal data (including sensitive personal data) or make personal data available to third parties on the basis of protecting your 'vital interest' (i.e. your life or your health).

We will use your personal data in order to monitor the outcome of your treatment by us and any treatment associated with your care, including any NHS treatment.

We participate in national audits and initiatives to help ensure that patients are getting the best possible outcomes from their treatment and care. The highest standards of confidentiality will be applied to your personal data in accordance with Data Protection Laws and confidentiality. Any publishing of this data will be in anonymised, statistical form.



Anonymous or aggregated data may be used by us, or disclosed to others, for research or statistical purposes.

Certain information which you submit may also be collected to enable us to better understand our customers, to improve our website, to inform general marketing and to help provide a better experience of our services. We may use cookies to do this. We may also use other companies to set cookies on our websites and gather cookie information for us – please refer to the information detailed below. From time to time we may also analyse Internet Protocol (IP) addresses or other anonymous data sources.

Cookies

Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites.

By law, website operators are required to ask for a website user's permission when placing certain kinds of cookie on their devices for the first time. Where consent is required, the law states that it should be "informed consent", which means we must ensure that you understand what cookies are and why we want to use them. We are committed to providing the best digital service to you whilst at the same time fully protecting your privacy. For further information on our cookies policy and how we use cookies through use of all our online services, please see below.

What are Cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

Category 1 Cookies

These cookies are essential in order to enable you to move around our websites and use its features, such as accessing secure areas of the websites. Without these cookies, services you have asked for cannot be provided.

Your consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by you.

We use these types of cookies.

Category 2 Cookies



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These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All the information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioural/ targeted advertising networks.

We use these types of cookies. By using our website and online services you agree that we can place these types of cookies on your device.

Category 3 Cookies

These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video. The information these cookies collect is generally anonymised and they cannot track your browsing activity on other websites.

We use these types of cookies. By using our websites these you agree that we can place these types of cookies on your device.

Category 4 Cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

We do not use these cookies on our website.

Definitions used above are consistent with those supplied by the International Chamber of Commerce 'ICC UK Cookie Guide' April 2012.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential Category 1 Cookies) you may not be able to access all or parts of our websites. For information on how to delete cookies, please refer to:

use <https://ico.org.uk/for-the-public/online/cookies>



It is our policy not use your data for marketing purposes

Accessing and updating your information

The law gives you certain rights in respect of the personal data that we hold about you. Below is a short overview of the most commonly used rights. It is not an exhaustive statement of the law.

- With some exceptions designed to protect the rights of others, and subject to payment of a small administrative fee (currently £10, or up to £50 for paper-based health records), you have the right to a copy of the personal data that we hold about you.
- You have the right to have the personal data we hold about you corrected if it is factually inaccurate. It is important to understand that this right does not extend to matters of opinion, such as medical diagnoses. If any of your personal data has changed, especially contact information such as: email address, postal address and phone number please get in touch with us at hello@westminsterwomens.co.uk so we can ensure your personal data is kept up to date.
- If you want to exercise your rights in respect of your personal data, the best way to do so is to contact us by email [enter e-mail address] In order to protect your privacy, we may ask you to prove your identity before we take any steps in response to such a request.
- If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website (<http://www.ico.org.uk>).